

THE CITY OF NEW YORK

LAW DEPARTMENT

100 CHURCH STREET
NEW YORK, NY 10007

EDWAR ESTRADA
Labor and Employment Law Division
Phone: (212) 356-3177
Fax: (212) 356-2438
Email: eestrada@law.nyc.gov

July 26, 2023

Via ECF

Corporation Counsel

HON. SYLVIA O. HINDS-RADIX

Honorable Ona T. Wang United States District Court Southern District of New York 40 Foley Square New York, New York 10007

MEMO ENDORSED.

Re: <u>Dass v. City University of New York, et al.</u> Civil Acton No. 18-CV-11325 (VSB) (OTW)

Dear Judge Wang:

I am a Senior Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for Defendants in the above-referenced action. Defendants write to request an extension of time to respond to Plaintiff's Request for Admission from August 14, 2023 to September 8, 2023 and an adjournment of the August 15, 2023 status conference (Dkt. No. 198) to September 19, 2023. Plaintiff's counsel does not object to these requests.

These extensions are necessary because Defendant Hostos Community College's Executive Counsel is on vacation during the time Defendants were given to respond to the Request for Admissions and will be unable to obtain responses until his return. Additionally, the undersigned will no longer be employed by the New York City Law Department after August 9, 2023. Defendants' newly assigned Assistant Corporation Counsel will need time to familiarize themselves with the facts and extensive procedural history prior to appearing before Your Honor. Therefore, Defendants respectfully request that they be granted an extension of time to respond to Plaintiff's Request for Admissions and an adjournment of the August 15, 2023 status conference.

Thank you for your consideration of this request.

Defendants' motion for an extension until **September 8, 2023**, to respond to Plaintiff's Request for Admission is **GRANTED**. The

August 15, 2023, status conference is ADJOURNED to September

19, 2023 at 12:00 p.m. The parties are directed to submit a joint

proposed conference agenda by September 15, 2023.

Respectfully submitted,

Edwar Estrada|s|

Edwar Estrada, Esq.

Counsel for Defendants

SO ORDERED.

Ona T. Wang U.S.M.J. 7/27/23